

## **Exhibit E**

## CONDENSED TRANSCRIPT

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

VANGUARD IDENTIFICATION  
SYSTEMS, INC.,

Plaintiff,

vs.

RONNIE E. GOADE, SR.,  
et al.,

Defendants.

NO. 02-2943

Oral deposition of ROBERT  
W. KANE, taken at the law offices of  
BAZELON, LESS & FELDMAN, P.C., 1515  
Market Street, Suite 700,  
Philadelphia, Pennsylvania, on  
Tuesday, June 15, 2004, at 2:31 p.m.,  
before Rosemary Locklear, Registered  
Professional Reporter, Certified  
Shorthand Reporter (NJ), Certified  
Realtime Reporter and Notary Public,  
pursuant to notice.



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## ORAL DEPOSITION OF RIOBERT W. KANE, 6/15/04

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1 held him more responsible because the  
2 infringement occurred or was  
3 initiated while he owned the company  
4 and it continued during that period  
5 of time through -- throughout the  
6 litigation while he owned the company  
7 and then DocuSystems had agreed to  
8 stop manufacturing that product and  
9 that that may have been the reason.

10 BY MR. ZAKEN:

11 Q. I --

12 A. And -- I'm sorry. Go  
13 ahead.

14 Q. Go on. I didn't mean to  
15 interrupt your answer.

16 A. Well, and -- and in the  
17 event that -- well, that's it. I  
18 don't want to speculate.

19 Q. Now, at the time that this  
20 settlement of the lawsuit was entered  
21 into that's Warther Exhibit 5, do you  
22 know if Mr. Goade was involved in  
23 those discussions?

24 A. Don't know.

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1 settlement was reduced to the legal  
2 form that it is presented in here, in  
3 Warther Deposition Exhibit 5, as  
4 opposed to, for example, a settlement  
5 agreement or a letter agreement like  
6 you referenced earlier?

7 MR. BOCHETTO: Objection.

8 And I want you to be  
9 careful here not to relate anything  
10 that may have been told to you by an  
11 attorney who was representing you at  
12 the time. If you can answer the  
13 question independently of that, you  
14 may do so with my objection but do  
15 not relate anything any attorney  
16 might have told you.

17 THE WITNESS: I -- I don't  
18 know for sure.

19 BY MR. ZAKEN:

20 Q. At the time that this  
21 settlement was entered into, did you  
22 believe that DocuSystems was going to  
23 pay on that settlement?

24 A. We believed that we were

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1 MR. BOCHETTO: If you know.

2 THE WITNESS: I don't know.

3 BY MR. ZAKEN:

4 Q. You didn't participate in  
5 any conversations that Mr. Goade  
6 participated in leading to this  
7 Warther Deposition Exhibit 5  
8 settlement?

9 A. No.

10 Q. And is it true that  
11 DocuSystems ceased infringing on the  
12 product after the agreement was  
13 reached --

14 MR. BOCHETTO: Objection --

15 BY MR. ZAKEN:

16 Q. -- between DocuSystems and  
17 Vanguard, if you know?

18 MR. BOCHETTO: Objection.

19 You may answer.

20 THE WITNESS: To the best  
21 of our knowledge and belief, they had  
22 stopped infringing.

23 BY MR. ZAKEN:

24 Q. Do you know why the

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1 going to collect the money, yes.

2 Q. That's why you had the  
3 victory party?

4 A. Yes.

5 Q. And what efforts did you  
6 make to or did Vanguard make to  
7 collect on this judgment?

8 MR. BOCHETTO: And let me  
9 caution the witness not to relate any  
10 communications you had with counsel  
11 or any work product of counsel.

12 THE WITNESS: Okay.

13 We contacted two attorneys.

14 BY MR. ZAKEN:

15 Q. Who were they?

16 A. Gary Rosen and subsequently  
17 Bochetto & Lentz.

18 Q. And the conversations with  
19 Gary Rosen occurred shortly after the  
20 Judgment was entered into?

21 MR. BOCHETTO: Objection.

22 You know --

23 BY MR. ZAKEN:

24 Q. Just asking for time frame.



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